

 ORIGINAL

Jung18.appdisc

LEONARDO M. RAPADAS
United States Attorney
KARON V. JOHNSON
Assistant U.S. Attorney
Suite 500, Sirena Plaza
108 Hernan Cortez
Hagåtña, Guam 96910-5113
PHONE: 472-7332
FAX: 472-7334

FILED
DISTRICT COURT OF GUAM

APR 02 2008

JEANNE G. QUINATA
Clerk of Court

Attorneys for the United States of America

**IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM**

UNITED STATES OF AMERICA, } CRIMINAL CASE NO. 06-00074
Plaintiff, } UNITED STATES APPLICATION TO
vs. } DISCLOSE CERTAIN TAX INFORMATION
DONG SIK JUNG, }
Defendant. }

COMES NOW the United States of America, by and through undersigned counsel, and moves this Honorable Court for an order allowing the government to disclose certain records obtained from the Internal Revenue Service (IRS) to defense counsel Joaquin C. Arriola, Jr. On February 3, 2006, the court issued an Order, Misc. Case No. 06-00001, directing the IRS to disclose to the U.S. Attorney's Office any information it held on Taxpayer Identification Number XXX-XX-4802, among other matters.

Defendant Jung was indicted in the above-entitled matter, and made his initial appearance March 28, 2008. He is represented by Joaquin C. Arriola, Jr. The IRS information concerning the TIN referenced in the above-listed order is necessary for Mr. Arriola to evaluate the strength of the government's case, because the defendant is accused of fraudulently obtaining a Guam driver's license by using a fraudulent TIN. The release of such information is allowed by Title

1
26, United States Code, Section 6103((i)(4)(A)(i) as information "probative of a matter in issue
1
relevant in establishing the commission of a crime or the guilt or liability of a party."
2

3
Respectfully submitted this 2nd day of April, 2008.
4

5
LEONARDO M. RAPADAS
4
United States Attorney
Districts of Guam and NMI
6

7
By: 
KARON V. JOHNSON
7
Assistant U.S. Attorney
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28